

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
MOTORS LIQUIDATION COMPANY, *et al.*, : Case No.: 09-50026 (REG)
f/k/a General Motors Corp., *et al.* :
: (Jointly Administered)
Debtors. :
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**STIPULATION AND AGREED SCHEDULING ORDER REGARDING
THE MOTION FOR LEAVE TO PURSUE CLAIMS AGAINST GENERAL
MOTORS LLC, AND, ALTERNATIVELY, TO FILE A POST-BAR-DATE PROOF
OF CLAIM IN THE MOTORS LIQUIDATION COMPANY BANKRUPTCY**

General Motors LLC (“**New GM**”), the Motors Liquidation Company GUC Trust (“**GUC Trust**”), and Roger Dean Gillispie (“**Mr. Gillispie**,” and collectively with New GM and the GUC Trust, the “**Parties**”) respectfully submit this Stipulation and Agreed Scheduling Order regarding the briefing schedule for the *Motion For Leave To Pursue Claims Against General Motors LLC, And, Alternatively, To File A Post-Bar-Date Proof Of Claim In The Motors Liquidation Company Bankruptcy*, filed by Mr. Gillispie on June 17, 2014 [Dkt. 12727] (“**Motion**”):

1. In connection with the Motion, the Parties have agreed on the following briefing schedule:

| Event | Agreed Date |
|--|---|
| New GM and the GUC Trust to file responses (“ <u>Responses</u> ”) to the Motion | August 19, 2014 |
| Mr. Gillispie to file a reply to the Responses | September 18, 2014 |
| Hearing on Motion | Scheduled by the Court after briefing has concluded |

2. This Stipulation is subject to approval by the Court. In the event the Court declines to approve this Stipulation, it shall be null and void, with no effect.

3. This Stipulation may be executed in counterparts, any of which may be transmitted by facsimile, and each of which shall be deemed an original.

4. The Parties each reserve the right to seek a continuance of any deadlines or dates set forth herein.

SO AGREED TO BY AND AMONG THE FOLLOWING:

/s/ Scott Davidson

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Attorneys for General Motors LLC

/s/ Lisa H. Rubin

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*Attorneys for the Motors Liquidation
Company GUC Trust*

DATED: July 3, 2014

DATED: July 3, 2014

/s/ David B. Owens

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312-243-5900

Attorneys for Roger Dean Gillispie

DATED: July 3, 2014

SO ORDERED.

Dated: New York, New York
July 7, 2014

s/ Robert E. Gerber

Honorable Robert E. Gerber
United States Bankruptcy Judge